

From: Pat Borison [mailto:pborison@yahoo.com]
Sent: Monday, January 14, 2013 9:21 AM
To: Alexander, Kia@DeltaCouncil
Subject: Re: Comments on Proposed Rulemaking -Delta Plan

Comments on Proposed Rulemaking – Final Draft Delta Plan

The Plan has a lot of good information, is well-written and clearly outlines many of the problems and issues facing the Delta. However, there are some glaring omissions.

>Policies governing conveyances:

“Conveyances” that would divert Delta water seem to be treated as a given instead of analyzed as an option – an expensive one.

The Delta Stewardship Council should include regulatory policies governing conveyances, including a peripheral canal or tunnels. The Council – and not water contractors -- need to be the judge of whether canals or tunnels harm the Delta. Trying to build a plan to restore the Delta while ignoring the peripheral canal or giant tunnels doesn't make sense. How can it be that the DSC -- supposedly the chief protector of the Delta -- doesn't have any authority to determine if the tunnels are a threat to the Delta or not?

How can you accomplish your mission if you have to stand by and allow the water contractors to drain the Delta?

>How much water does the Delta need?

The Plan seems to overly promote water exportation without adequately considering alternatives, such as promoting statewide water conservation, water use efficiency, and sustainable water use.

I understand that the State Water Resources Control Board is supposed to provide you with information about how much water must stay in the Delta and how much can be exported.

But you have completed the Delta Plan before you even have that information.

How can you say what is needed for the Delta when you don't have the most basic scientific information?

How can you achieve the goal of restoring the Delta when you don't even know how much water can safely be exported because the State Water Resources Control board hasn't provide the required scientific information?

>Alternatives to conveyances are not discussed:

Why doesn't the Delta Plan discuss the many alternatives to the giant tunnels submitted by many environmental groups and others?

You should include in the regulations a range of alternatives that should be

considered before deciding on the tunnels. What about the west Delta Intake Concept? What about harvesting flood waters from the Yolo Bypass or Sacramento Weir instead of taking water out of the Delta?

Why don't the regulations require water contractors to consider a plan where they would harvest the millions of gallons of water that are wasted when big storms come and the flow of the Sacramento River is diverted down the Yolo Bypass and over the flood control weirs into farmers fields? It makes more sense to take this water than to drain the Delta.

>Boating impacts:

While the Plan recognizes the allure of boating to the Delta community, it does not adequately look at the impact of potential barriers (such as "Gates" across navigable waters) would have on boating, especially on those vessels larger than kayaks or outboard fishing boats. It also does not address the impacts the flooding of islands would have on navigation.

Flooding Delta islands appears to be the primary focus for restoring Delta habitat, yet there is no proof that flooding islands does significantly help.

>South Delta concerns:

Of particular concern to south Delta communities, such as Discovery Bay, is maintaining adequate water circulation to avoid stagnation. If water is to be pumped out, perhaps a forebay for the state project as well as the Federal one might create less impact on the environment.

I support the recommendation (WQ R1) to maintain water quality on Delta waters, including the South Delta.

Pat Borison

Discovery Bay CA